

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re:

	*
William M. Pastore	Chapter 13
Rosemarie Pastore	*
	*
Debtors	*
	Case No: 09-16074BIF

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**APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Michael P. Kutzer applies under §330 of the Bankruptcy Code for an award of compensation and reimbursement of actual, necessary expenses and represents:

1. That, Michael P. Kutzer, Esquire, is attorney for the Debtor in the above-captioned case.
2. The Debtor filed a petition under Chapter 13 of the Bankruptcy Code on August 14, 2009
3. The Debtor's annualized current monthly income as set forth on Form B22C is:

above median (the amount on line 15 is not less than the amount on line 16)

below median (the amount on line 15 is less than the amount on line 16)

4. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable.

5. Michael P. Kutzer, Esquire requests an award of compensation of \$3,500.00 for 15.3 Attorney hours and 1.8 Clerk hours expended in providing the following services :

**SERVICES RENDERED:**

- (a) Analysis of the financial situation, and negotiation with opposing counsel and rendering advice and assistance to the Debtor in determining whether to file a petition under Title 11 of the USC. Counsel Debtor on alternative chapters available under bankruptcy law and effects and consequences of filing a petition.

- (b) Order credit report.
- (c) Meet with client re: property value, review credit reports. Review additional bills, income and expenses.
- (d) Interview with client. Preparation and filing of the Petition and Statement of Social Security Number.
- (e) Notify utilities. Call to confirm.
- (f) Notify secured creditors and Sheriff.
- (g) Preparation and filing of the matrix.
- (h) Preparation of Debtor's Chapter 13 Current Monthly and Disposable Income and Chapter Plan.
- (i) Interview with client. Prepare, file and serve Chapter 13 Plan, Statement of Affairs, schedules and other documents required by the court.
- (j) Letter to client re: Trustee and mortgage payments and amount, obligations leading to plan confirmation and beyond.
- (k) Review Notice from PA Department of Revenue and IRS to file returns.
- (l) Handle creditor call regarding the status of the case and notice to certain creditors. Review and respond to collection attempts by creditors, collection agencies, attorneys and others.
- (m) Review Proof of Claim. Check Sheriff's sale fees. Review foreclosure docket. Review plan.
- (n) Letter to client to attend Creditor's Meeting. Review Trustee's report. Find comparable sales, check real estate taxes owed and get tax assessment.
- (o) Review Proof of Claims filed by unsecured creditors. Discuss with client to review and confirm accuracy.
- (p) Review Proof of Claim filed by the City of Philadelphia.
- (q) Review correspondence from Mortgage Company regarding delinquent payments.
- (r) Contact Trustee to reschedule Creditor's Meeting. Serve Creditors. Prepare, file and serve Certificate of Service. Contact client for 341 requests and payments.

- (s) Contact client for 341 requests and payments
- (t) Contact client to attend Creditor's meeting.
- (u) Preparation and representation of debtor at Creditor's Meeting.
- (v) Prepare, serve and file Amended Chapter 13 plan.
- (w) Discuss Proof of Claim with counsel from the mortgage company.
- (x) Get case ready for Confirmation. Review plan, claims register and docket. Contact client.
- (y) Meet with client to complete Pre-Confirmation Certification and discuss case. Send Pre-Confirmation Certification to Trustee.
- (z) Confirmation hearing. Hearing continued.

**Total amount of hours 15.3 Attorney hours and 1.8 Clerk hours**

**POST-CONFIRMATION SERVICES:**

- a Correspondence, telephone conversations and miscellaneous contact with creditors, Trustee, opposing counsel, and Debtor.
- b Preparation and filing of miscellaneous pleadings, motions, and applications, together with accompanying notices, if necessary.
- c Preparation and filing of application to discontinue wage order and notification of employer, if applicable.
- d Monitor case.
- e Preparation of praecipe for discharge and certification of discharge.
- f Review and distribution to creditors

6. Applicant requests reimbursement of expenses in the amount of \$20.00 for the following expenses:

Amended schedule F  
Send notice to creditors, correspondence to client @ .42 each  
Pacer charges  
Copies, faxes

7. The Debtor paid Michael P. Kutzer, Esquire \$500.00 prior to the filing of the petition.

8. A copy of the Applicant's Disclosure of Compensation pursuant to Fed. R. Bank. P. 2016(b) is attached hereto as Exhibit "A".

9. None of the compensation paid to Applicant will be shared with any person other than a member or regular associate of Michael P. Kutzer's law firm unless 11 U.S.C. § 504 (c) applies.

WHEREFORE, Michael P. Kutzer, Esquire requests an award of \$3,500.00 in compensation and \$20.00 in reimbursement of actual, necessary expenses.

Dated: August 11, 2010

Signed: /s/ Michael P. Kutzer  
Michael P. Kutzer, Esquire  
Attorney at Law  
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